



Project Strategy - Analysis Process

Air Quality Increment in Missouri
Air Pollution Control Program
Prevention of Significant Deterioration

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Missouri
Department of
Natural Resources

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- Project Strategy

- ☆ This is strictly information related to the actual "catch-up" strategy. There are certain things that we need to do in order to be able to redesignate areas in Part 81.



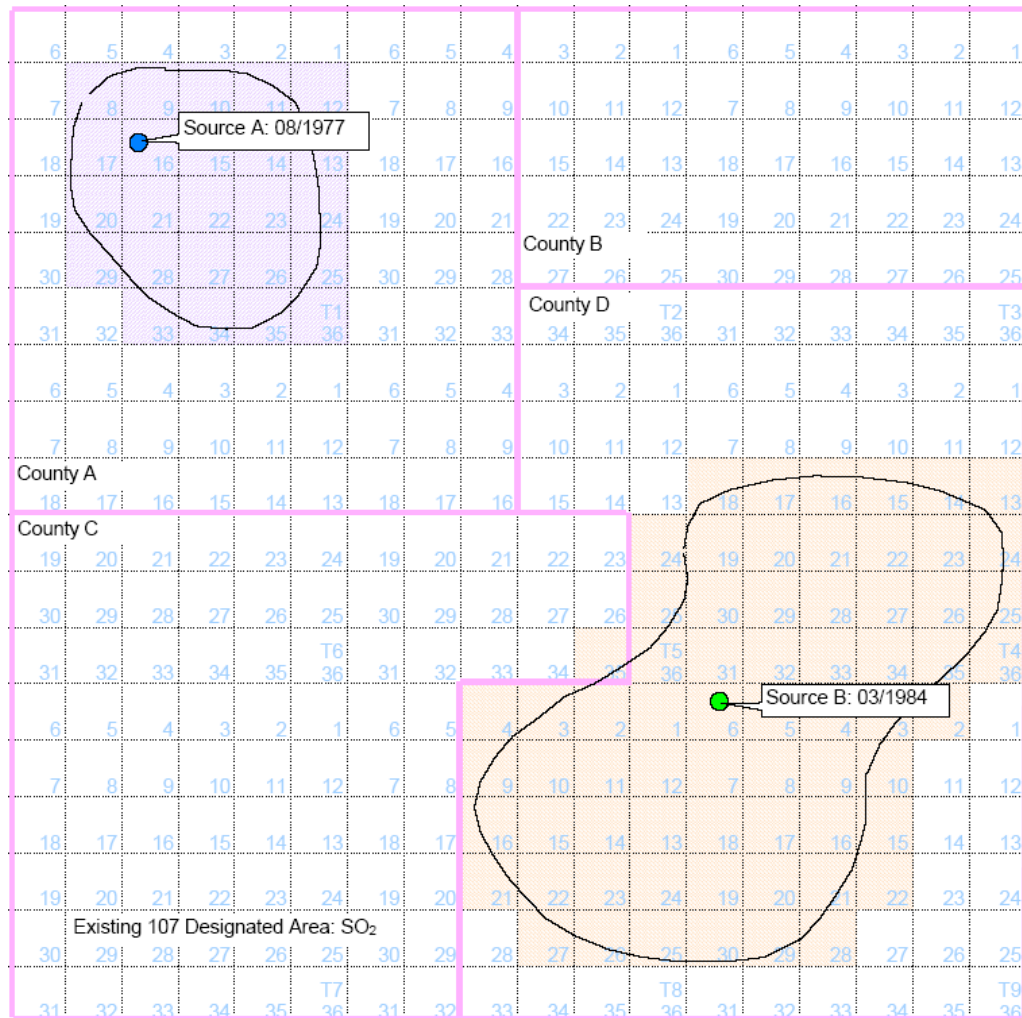
- **Project Strategy
Analysis Process**

- ☆ Each of the PSD projects that are listed in the Consolidated PSD Project Listing described by Maher will require an analysis. The following are the commitments that APCP needs to fulfill in order to complete the processing of these old projects.



- Analysis Process
Permitted sources impact area

- ☆ This analysis will establish the baseline area according to the USGS sectional system. All sections containing receptors that exceed the $1 \mu\text{g}/\text{m}^3$ will be included in the baseline area. The baseline date will be the date of the complete application.





- Analysis Process
Air quality increment analysis

- ☆ Emissions
- ☆ Existing Baseline Interactions
- ☆ Evaluate each project using case-by-case evaluation techniques.
For example, determine the impact area interaction with existing baseline areas before proceeding with unnecessary and time-consuming inventory development.
- ☆ Receptors to Analyze
- ☆ Other Considerations



- Analysis Process
Legal Follow-up: Federal/State Rulemaking

- ☆ MDNR developed the following example wording to incorporate baseline area and date designations into the permit report.

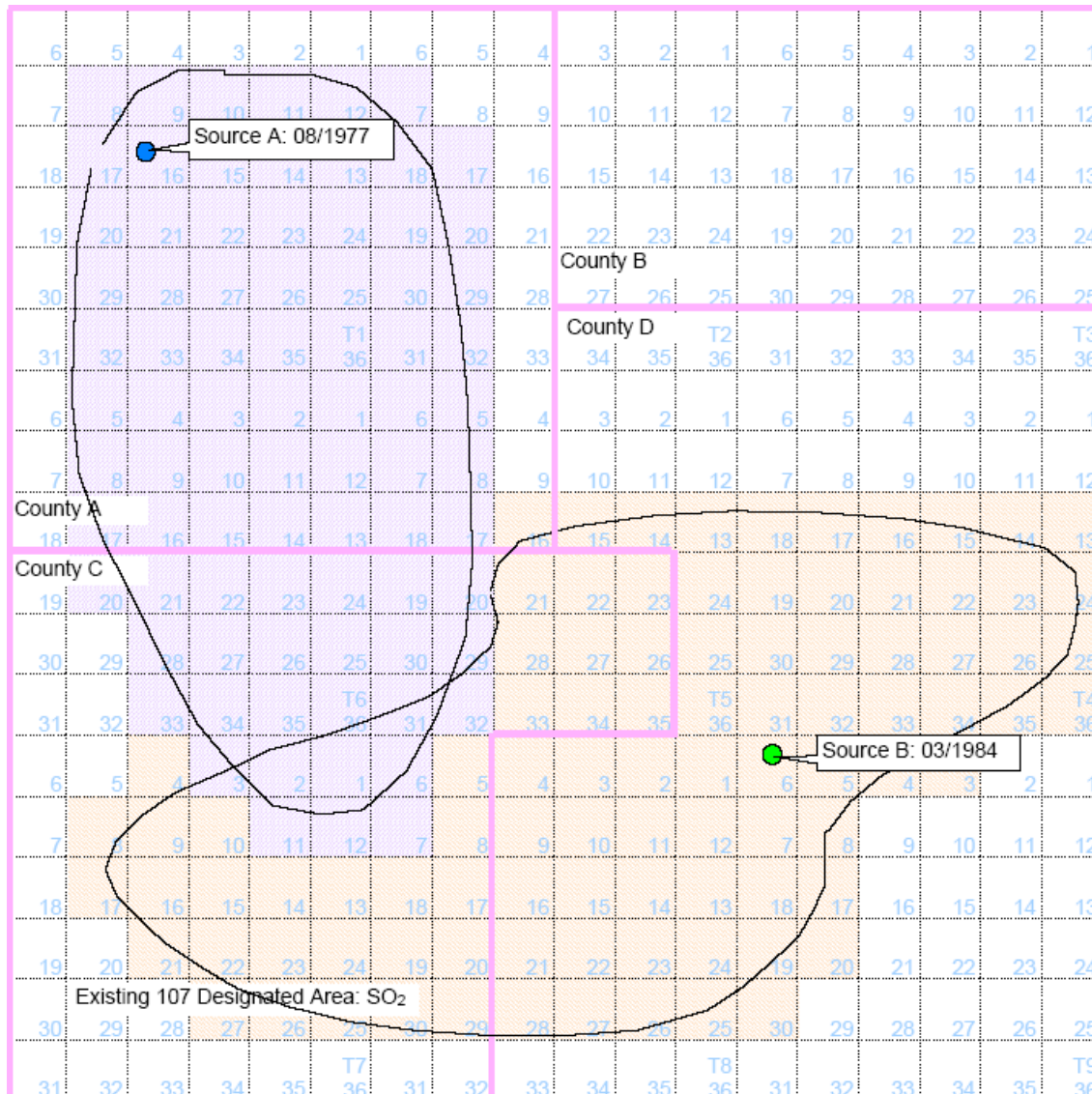
“The Air Quality Analysis has identified the following areas that contain a modeling receptor in excess of the significant concentration:”

Baseline Area For <i>Pollutant</i> Increment Analysis			
County	Township	Range	Sections
xxxxxxxxxx	T35N	R2W	S7,18,19,20,28,29,30,32,33
xxxxx	T35N	R2W	S27,34
	T34N	R2W	S1,2,3,10,11,12,13,14,15,22,23,24,25,26,27,34,35,36
	T34N	R1W	S5,6,7,18,19,20,28,29,30,31,32,33
xxxxx	T34N	R3W	S10
	T34N	R2W	S4,5,6,7,8,9,16,17,20,21,28,29,32,33
xxxxxxxxxx	T33N	R3W	S1
	T33N	R2W	S1,2,3,4,6,8,10,11,20
	T33N	R1W	S4,6
68 total sections			



- Analysis Process
Legal Follow-up: Federal/State Rulemaking

- ☆ Pollutant specific Part 81 designations will not overlap. Any impact area overlap will be evaluated for increment consumption, and the subsequent baseline area designation will "carve out" that area already designated. Impact area may overlap. That is not prohibited by regulation. However, were impact areas overlap, increment is further consumed from the original baseline date. However, designated baseline areas are prohibited from overlapping, since there can only be one, single minor source baseline date. That is why the portion of the impact area not already designated as some other baseline area, will make up the new baseline area.





Thank You!